



The unchecked expansion of live facial recognition technology in London

A report by Zoë Garbett
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February 2026

FOREWORD

This report brings together my personal tracking of how the Metropolitan Police Service (MPS) have been using live facial recognition (LFR) technology since they started using it operationally in 2020 and from the very first uses of the technology 10 years ago. This report acts as the alternative story to the report the MPS put out last year about their use of LFR.

I am not opposed to technology. From my time working in the NHS, I know how transformative advances in technology can be – they can legitimately be lifesaving – but advances in technology cannot be allowed to undermine our rights and our civil liberties.

The police claim to “police by consent”, but with technology such as LFR expanding at such a rapid rate, and without primary legislation governing its use or genuine consultation, it is difficult to see how this can continue to be the case.

There is a disparity between the story told by the police about LFR and what is happening in reality. This report will address that gap and the lack of transparency. It will lay out how LFR use is expanding rapidly, how LFR is used disproportionately against Black and global majority people, how LFR is mainly used to arrest people for theft not violent crime, how it isn’t used to find missing people, how there are children on the police watchlists, and many other issues.

There is currently a government consultation regarding live facial recognition technology but given the statements from the current Home Secretary praising LFR and calling for its expansion, it is easy to see what the likely outcome of this consultation will be: LFR is

coming to a street near you whether you like it or not.

This report has been informed greatly by the work of Big Brother Watch and Liberty who have both been at the forefront of opposing the expansion of LFR into our daily lives and have been consistently standing up for all of our civil liberties. My thanks to them for all of their work in this area. I also give thanks to Siân Berry MP and Croydon Councillor Ria Patel for their input into this report.

After you have read this report, please take the time to respond to the government consultation and tell them you don’t want LFR on our streets. The final section of this report has a guide for how to respond.

Together we might be able to stop this expansion of police surveillance.

I hope my recommendations are taken up by the Mayor and the Metropolitan Police Service and they listen to the concerns raised by Londoners.



Zoë Garbett AM
February 2026



EXECUTIVE SUMMARY

Elected local and national representatives, as well as civil rights campaigners have all been raising concerns about live facial recognition technology for nearly a decade, ever since the first trials of the technology began. These concerns need to be listened to and acted on.

No specific legal power

There is no specific law (i.e. primary legislation) that allows the use of live facial recognition (LFR) technology. Yet police services across England and Wales continue to use it. The Metropolitan Police Service (MPS) acknowledges this themselves saying: "The use of overt LFR for law enforcement purposes is not subject to dedicated legislation".¹ Despite there being no law that grants the police the power to use LFR, they have resolved that they can and will decide how to regulate this themselves. This is wrong and needs to be changed as soon as possible in order protect both our rights and our safety by adding safeguards and specific controls on how, where and why LFR can be used such as not allowing children to be included on watchlists and a ban on other uses by the private sector or public authorities.

Flips the presumption of innocence

In our legal system people are considered innocent until proven guilty, LFR flips this principle. Facial recognition is a reversal of the presumption of innocence - the democratic principle that you shouldn't be spied on unless police suspect you of wrongdoing. Facial recognition subjects us all to spying. Walking down a street in London and having your face scanned and compared against a list of wanted people is essentially being part of an identification parade. While going about your business you are considered to be a potential

criminal by the police and having the equivalent of your fingerprint being scanned in order to continue walking down the street. This is wrong, is an infringement on our rights and should not continue.

Disproportionate deployment

LFR is used disproportionately in areas that, according to the London census, have more people of Black, Asian or Mixed ethnicities than the London average.² While the police and the national Government might claim that there is no bias in the technology itself (a claim that is somewhat disputed³) there certainly seems to be bias in the decisions of where and when to deploy the technology. The police make choices of how they want to police our streets. Top officers decide to push LFR technology, senior ones decide where and how often to conduct deployments and officers on the ground decide whether to speak to people identified by the technology or not. At each step of the process there is room for biases and disproportionality, from the individual officers and the system they are operating in, to creep in. The MPS has a long and well documented history of racism, homophobia, misogyny and ableism, most recently highlighted by the Baroness Casey review into the culture of the MPS.⁴ The MPS was first defined as institutionally racist by the 1999 Macpherson Inquiry into the death of Stephen Lawrence, a term the current Commissioner rejects.^{5,6} The usage of LFR in London falls unevenly on London's communities. This all contributes to some Londoners being overpoliced and under protected and should not continue.

Lack of transparency

The MPS has a history of a lack of transparency. This is perhaps best summarised by Baroness

Casey in her review of the MPS where she said: "The Met itself sees scrutiny as an intrusion. This is both short-sighted and unethical. As a public body with powers over the public it needs to be transparent to Londoners for its actions to earn their trust, confidence and respect." The MPS continue to not be open about the true cost of LFR deployments. The MPS continue to say LFR allows them to deliver

a greater impact on public safety than would be possible without LFR, but without these figures this is impossible to prove. The MPS needs to be more transparent with Londoners.

RECOMMENDATIONS

The Government consultation on facial recognition technology is an opportunity to review the ways live facial recognition and other similar technologies are currently used and also an opportunity to correct the many issues associated with their use. Below are my recommendations.

Recommendation 1:

The Metropolitan Police Service should stop using Live Facial Recognition Technology immediately.

Recommendation 3:

The Metropolitan Police Service should be honest with the public about the true cost of deployments of Live Facial Recognition Technology.

Recommendation 2:

The Mayor of London and the Deputy Mayor for Policing and Crime should call on the Government to introduce primary legislation governing with clear and strict controls on the use of Live Facial Recognition technology for the most serious and urgent crime purposes, and a ban on other uses by the private sector or public authorities.

Recommendation 4:

The Metropolitan Police Service should ensure that all tactics and technologies they deploy are free from bias in how they are constructed and how they are deployed. The assessments done by the police to decide each deployment is free from bias taking in to account all tactics, composition of the watchlist, location of deployment and technology used, should be shared publicly so Londoners can review it for themselves.

WHAT IS LIVE FACIAL RECOGNITION

How does it work

Live Facial Recognition (LFR) technology scans the faces of people in an area and compares them to a list of faces put into a watchlist built by the police. If the system finds a match it alerts a police officer in the area who then reviews the match and decides whether or not to speak to the person.

This means that if you are walking in an area where LFR technology is being deployed, your face is scanned and turned in to a “Biometric Template” which is a set of numbers that describe your facial features. These numbers are then compared against a list of “Biometric Templates” of people the police are looking for.

The system checks your template against this list and generates a similarity score for how similar your template is compared to all the other templates on the list, with a higher score meaning the templates are more similar. If the similarity score is higher than the threshold set by the police, then an alert goes to an officer who reviews the match and decides whether or not to engage with you, potentially leading to an arrest.

The police are supposed to put up signs telling you LFR is in use in an area so you can opt out of going through it. But I have seen the police deploy the technology in areas such as outside of shopping centres, markets and outside of train stations so that by the time you see the sign alerting you to its use, it is too late, and you are already within scope of the cameras and have no opportunity to opt out.

The MPS facial recognition system is by created by NEC, a publicly listed Japanese tech company. The cameras used for LFR deployments are supplied by AXIS, a Swedish surveillance camera company that is a subsidiary of publicly listed Japanese camera manufacturer Canon.⁷

History

2016

The first trials of Live Facial Recognition (LFR) technology by the Metropolitan Police Service (MPS) took place at Notting Hill Carnival 2016.

2017

Another trial took place at the 2017 edition of the Notting Hill Carnival and the Remembrance Sunday event in 2017.⁸

2018

In February 2018 the London Assembly Oversight Committee wrote to the Mayor of London Sadiq Khan asking him: “to consider suspending the use of this technology until a clear legal framework is in place and MOPAC has conducted a meaningful consultation process.”⁹

2019

The London Policing Ethics Panel published a report in May 2019 about Live Facial Recognition Technology which found that younger people and Asian, Black and Mixed ethnic groups were much more likely to say

they would stay away from LFR monitored events.¹⁰

Reports from 2018 and 2019 from the House of Commons Science and Technology Committee said LFR should be stopped due to concerns over the effectiveness and bias while also saying that it should not be used until there is legislation in place about LFR.¹¹

A July 2019 report from The Human Rights, Big Data and Technology Project at Essex University found that: “without explicit legal authorisation in domestic law, it is highly possible that deployment of LFR technology may be held unlawful if challenged before the courts”.¹²

2020

LFR was first deployed operationally on 11 February 2020 in Stratford near Westfield. Siân Berry, while a Green Party Member of the London Assembly, attended this first deployment to observe how the MPS used this technology.¹³

The MPS deployed LFR three times in 2020.

2021

The MPS did not deploy LFR in 2021, most likely due to the pandemic.

2022

The MPS deployed LFR six times in 2022.



2023

In January 2023 Newham council passed a motion called for LFR to not be used in the borough.¹⁴ Since that motion was passed LFR has been used 31 times in Newham by the MPS.

In June 2023 Amnesty International reported that the European Parliament adopted a ban on facial recognition as part of the EU's AI Act¹⁵. The law said the use of biometric identification systems by law enforcement is banned, except in narrowly defined situations such as “targeted searches of victims (abduction, trafficking, sexual exploitation), prevention of a specific and present terrorist threat, or the localisation or identification of a person suspected of having committed one of the specific crimes mentioned in the regulation (e.g. terrorism, trafficking, sexual exploitation, murder, kidnapping, rape, armed robbery, participation in a criminal organisation, environmental crime)”.^{16,17}

The MPS deployed LFR 23 times in 2023.

2024

In July 2024 Islington Council passed a motion calling for LFR to not be used in the borough.¹⁸

In July 2024, Siân Berry MP asked a written question about whether the Home Secretary would bring forward legislation to regulate the use and deployment of live facial recognition technology. The Home Secretary responded that: “Live facial technology is already being used effectively by some police forces to identify suspects more quickly and accurately. Its use is governed by data protection, equality, and human rights legislation supplemented by specific policing guidance.”¹⁹

In November 2024 there was a debate in Parliament about police use of LFR technology with contributions from all five major political

parties with many highlighting the lack of legislation currently in place.²⁰

In December 2024, the Mayor of London told me the first annual report on the use of LFR would be published in September 2025.²¹

The MPS deployed LFR 180 times in 2024.

2025

In March 2025 the MPS said it would install permanent LFR cameras in Croydon, a first for London and the UK despite no formal evaluation of the effectiveness of the use of LFR.²²

The MPS was supposed to have published its first annual report about LFR technology in September 2025. The report was supposed to tell Londoners how LFR has been used, details about the watchlist composition and “demographic analysis relating to the Watchlist composition and the Alerts, the results gained”.²³ The report was eventually released on 31 October 2025.²⁴

On 4 December 2025 the UK Government launched a consultation into a new legal framework for law enforcement use of biometrics, facial recognition and similar technologies.²⁵ This consultation is open until 12 February 2026.

The MPS continues to be the most frequent user of LFR among all UK police forces, and

there continues to be no primary legislation governing LFR.

The MPS deployed LFR 231 times in 2025.

2026

In January 2026 the MPS claimed it had arrested over 100 people at the permanent LFR cameras in Croydon within the first three months of the pilot beginning in October 2025. In the same press release the MPS said since the start of 2024, LFR deployments in Croydon have led to 249 arrests of which 193 have since been charged or cautioned.²⁶

Also in January 2026, the Government released its white paper about reforming the police. In that white paper the Government promises to both roll out 40 new LFR vans to be deployed in town centres across England and Wales and create a bespoke legal framework for the use of technologies like facial recognition.



HOW DOES THE METROPOLITAN POLICE SERVICE USE LIVE FACIAL RECOGNITION?

Number of deployments

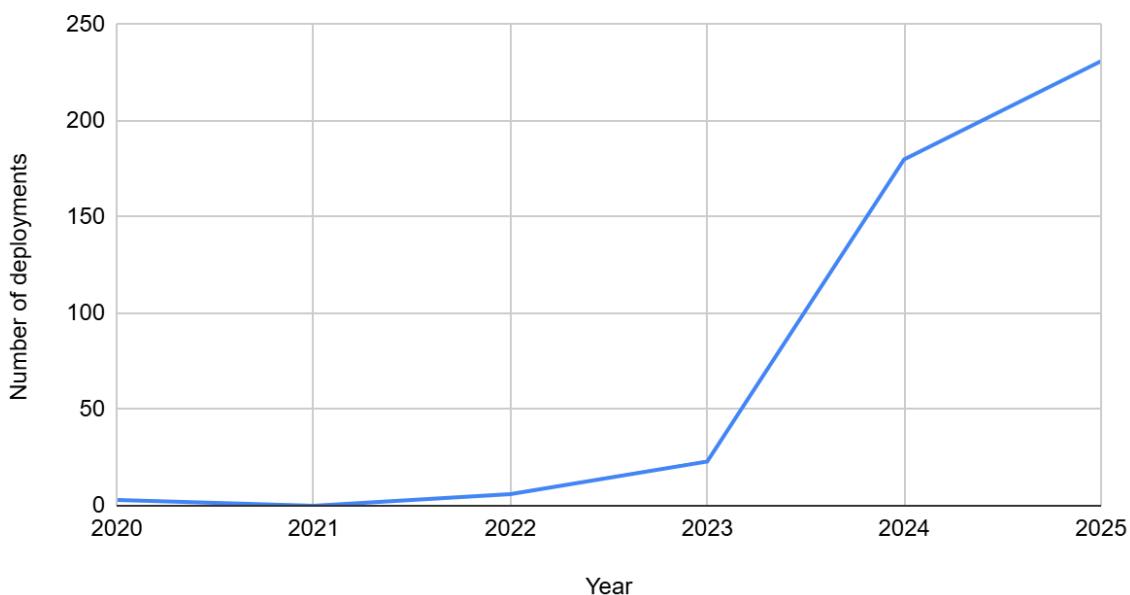
Since the first operation deployment of LFR in 2020 the rate that the MPS deploy LFR technology has increased massively. Even since 2023 when the MPS were deploying LFR on average every 15 days, the rate has increased significantly. In 2025 the MPS use LFR the equivalent of every 1.58 days.

Table 1: Number and frequency of MPS LFR deployments by year

Year	Number of deployments	A deployment every x days
2020	3	122
2021	0	n/a
2022	6	60.83
2023	23	15.86
2024	180	2.03
2025	231	1.58

Figure 1: Graph showing the number of deployments over the years

Number of deployments vs. Year



According to the MPS LFR policy they can only deploy the technology when certain criteria are met. These are:

- It is for a permitted 'use case' such as at a hotspot, at a protective security operation, or at a particular location to find someone
- It is in compliance with their rules about who can be on a watchlist and where the images come from
- It is at a permitted location
- when an authorising officer has determined that the deployment is proportionate
- it is subject to their requirements on transparency

The authorising officer for an LFR deployment has to be of at least the rank of Superintendent, unless in the case of urgency where an officer of the rank of Inspector may authorise the deployment.

If this does occur an officer of the rank of Superintendent or higher must be informed as soon as practicable and then it is for the Superintendent to then authorise the continued deployment.²⁷

Hotspot is the most common use case for a LFR deployment and is defined in the MPS LFR policy as:

- "A small geographical area of approximately 300-500m across where crime data and/or MPS intelligence reporting and/or operational experience as to future criminality indicates that that it is an area where: the crime rate; and/or the rate at which crime in that area is rising, is assessed to be in the upper quartile for that BCU/OCU area."

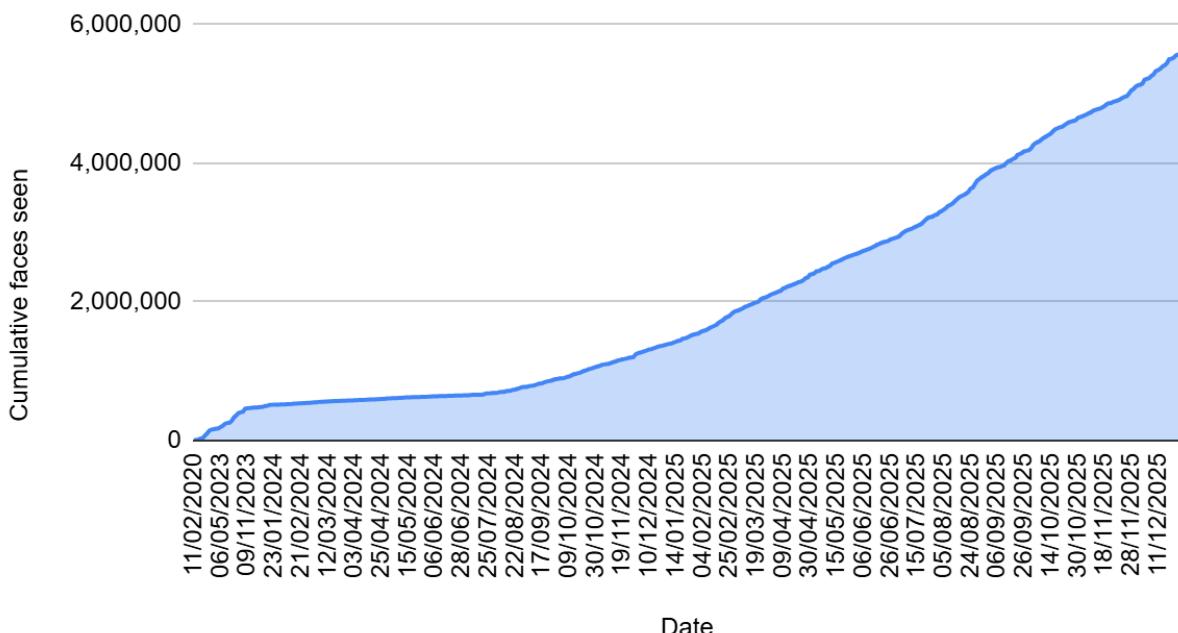


Conversations I have had with the MPS have revealed that arrests made as part of the LFR deployment do not inform the crime rate in an area. That it is driven by the crimes committed in that area and not the arrests. I am awaiting a response for the Mayor to a written question to get this confirmation in writing and in public.²⁸

The cumulative number of faces scanned by the technology as reported by the MPS has been increasing at a near exponential rate.

Figure 2: Graph showing the cumulative number of faces scanned by the MPS on LFR deployments by date

Cumulative faces seen vs. Date



This rapid increase in deployment has come with no evaluation of its effectiveness or consideration of the cost of using LFR compared to other possible policing and non-policing methods. In a written answer to me, the Mayor said that “Live Facial Recognition Technology (LFR) is deployed in support of wider policing operations and not as a standalone tactic, therefore, specific costs are not collated.”²⁹ I was also told that no business case was ever submitted for the use of LFR. The Mayor told me: “This is likely to be because any spend on this did not constitute new investment, and therefore sits outside the requirement for IPG scrutiny and approval”.³⁰ This is despite a MPS Assistant Commissioner in 2020 at the time for the first operational deployments saying: “As a modern police force, I believe that we have a duty to use new technologies to keep people safe in London.”³¹ These are both very disappointing answers that ignores that LFR is a new and novel technology

that not all police forces in the UK use and so there should be accountability from the MPS around how it is used.

I have also asked questions regarding how many officers have been used at LFR deployments to understand the costs associated with deployments. However, the MPS has refused to provide the number of officers used at deployments even when asking for the total since LFR deployments began, an average, or at a specific dated deployment saying “it is not possible to provide the exact figures requested due to the dynamic nature” of operational LFR deployments.^{32,33,34}

In a Freedom of Information Request from 2023 the MPS said that the estimated software and hardware cost of LFR at that point was £500,000.³⁵

Londoners would think that any expansion of technology such as this would have had to provide a business case for it. The NHS wouldn't be able to roll out a new treatment without being able to prove it was worthwhile and effective, but it seems that the police operate under their own rules and seemingly answer to no one.

In 2025, 925 Londoners were stopped by LFR cameras but had no further action taken against them. This is nearly as many as were arrested because of the technology (1,130). Each of these Londoners who were stopped had their day disrupted and inconvenienced because of police interference likely causing embarrassment to the person stopped too. I have previously asked the Mayor if Londoners can be provided with a record of being stopped by live facial recognition to help for example explain lateness for work.³⁶ Unfortunately the Mayor said: "There is no requirement for police to make a record if someone is stopped and spoken to, whether this stop is because of LFR or for another reason."

Watchlist size

According to the MPS LFR Annual Report watchlists have to be put together no more than 24 hours before the deployment and has to be deleted.³⁷ The MPS LFR policy also explains who can be on a watchlist, it includes:

- People wanted by the courts
- People subject to Multi-Agency Public Protection Arrangements (MAPPA) such as sex offenders
- People who have committed a "serious crime" and
- People subject to court orders³⁸

It is important to note that lots of these court orders and other arrangements would have been made before LFR became this widespread and so those who gave the conditions may not

have envisioned the impacts these orders might have when they handed them out.

As the number of deployments has increased the MPS has also increased the size of the watchlist used as well. Nearly every watchlist used is larger than the one used at a previous deployment. My colleague Caroline Russell was told in July 2023 that "Each deployment watchlist is pulled from a much wider pool of these wanted individuals and takes into account the intelligence case, purpose and location of the deployment."³⁹ However this data suggests that rather than making a new unique watchlist for each deployment based on the likelihood of people being in the area of the deployment, it seems from the outside that the MPS are just adding additional people on to a base watchlist they have.



Rather than LFR being an example of "precise policing" as the police like to frame it, it seems instead that deployments of LFR are more like a fishing trawler, a brute force method that they just keep adding to in order to try and find people.⁴⁰

With no controls on the Metropolitan Police and the way they decide to deploy this technology and the size and scope of their watchlists, there is little to stop them expanding beyond any reasonable appropriate scale for the number of deployments besides

their own decision-making process or the whims of senior officers.

Watchlists have consistently been bigger than the number of faces seen. At an 18 July 2024 deployment, for every face scanned over the 5-hour deployment there were nearly 50 faces on the MPS watchlist. This suggests that the watchlists are not nearly as precise and intelligence led as the police like to claim.

In December 2025, Liberty Investigates reported that children as young as 12 were among hundreds of under-18s included on police facial recognition watchlists.⁴¹ In response to Liberty Investigates the MPS were unable to provide the total number of children included on watchlists, but figures given to Liberty Investigates show that an average of **105** under-18s were included on each watchlist,

meaning thousands of children may have been included overall.

Locations of deployments

Since 2020, the MPS has conducted a LFR deployment in every borough in London. But some boroughs experience many more deployments of LFR technology than other boroughs. Westminster (**75**), Croydon (**55**) and Newham (**35**) are the boroughs that have had the most LFR deployments.

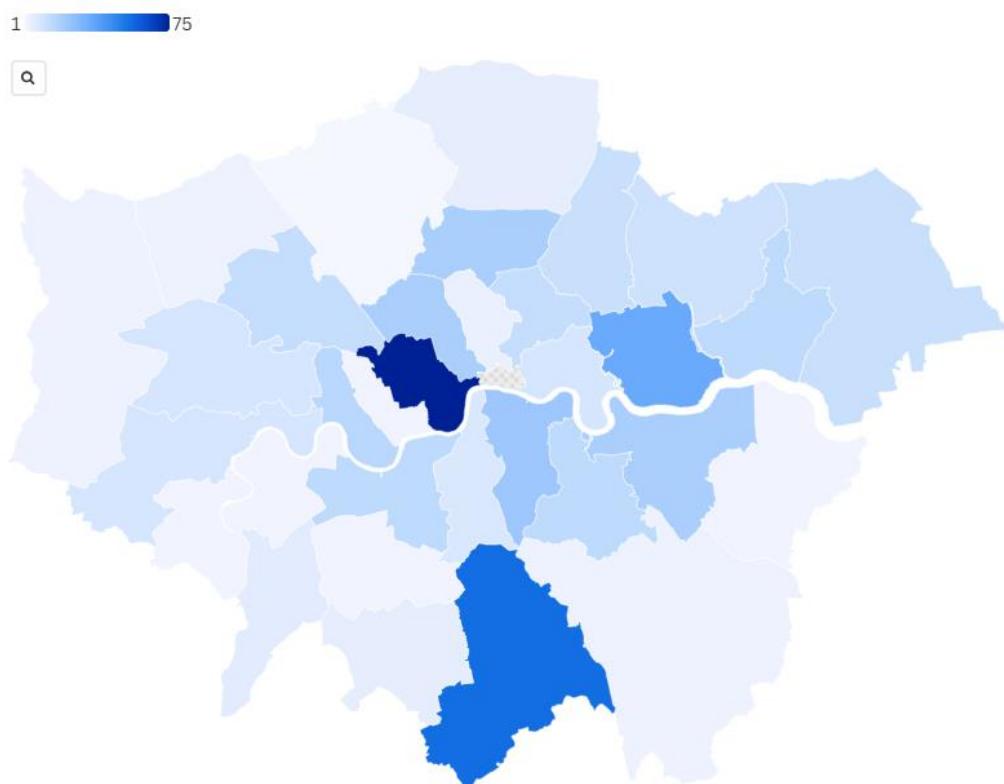
These boroughs have also experienced the most deployments per 100,000 residents since 2020 as well, showing that the technology is used disproportionately frequently in these boroughs based on their population size.⁴²

Table 2: Total LFR deployments and deployments per 100,000 residents since 2020 by borough

Borough	Deployments per 100,000 residents since 2020	Total deployments since 2020
Westminster	36.72	75
Croydon	14.08	55
Newham	9.97	35
Camden	9.52	20
Hammersmith and Fulham	8.73	16
Haringey	7.56	20
Southwark	7.48	23
Greenwich	6.92	20
Barking and Dagenham	6.85	15
Hackney	5.02	13
Lewisham	4.99	15
Havering	4.58	12
Wandsworth	4.58	15
Waltham Forest	4.31	12
Brent	3.82	13
Kingston	3.57	6
Redbridge	3.54	11
Hounslow	3.12	9
Tower Hamlets	2.9	9
Lambeth	2.52	8
Ealing	2.45	9
Sutton	2.38	5
Islington	1.85	4
Enfield	1.52	5
Kensington and Chelsea	1.4	6
Harrow	1.15	3
Richmond	1.02	2
Hillingdon	0.98	3
Merton	0.93	2
Bromley	0.91	3
Bexley	0.81	2
Barnet	0.26	1

The MPS are also more likely to deploy LFR in wards that have lower than the London average percentage of White residents. Since 2020 there have been **263** deployments in wards that have lower than the London average percentage of White residents and **180** deployments in higher-than-average wards. The difference in 2025 is **145** to **86**. This shows how the usage of LFR in London falls unevenly on London's communities.

Figure 2: Map showing the number of deployments by borough since 2020



Source: Greater London Authority

Future uses

In October 2025 the Metropolitan Police Service announced a new drone programme.⁴³ The MPS said the trial would mean drones would be dispatched to support officers by providing a live stream of video to officers to help them prepare for attending the situation. While LFR is not currently included on these drones, officers I have spoken to have indicated that this is something that might happen in the future.

That same month the Islington Tribune reported that according to the MPS "there are

currently no plans to use live facial recognition on drones, and there would be stakeholder engagement ahead of any policy change".⁴⁴ It's not clear if adding LFR to drones would count as a policy change. Adding LFR to drones would be an even more significant consent issue, currently the MPS puts up signs in the area to tell people the deployment is taking place, having a movable drone flying around London would make informing people about the deployment of LFR a lot harder resulting in many people not knowing their faces have been scanned. Londoners should be able to go about their business without having to provide

a form of biometric information to the MPS, adding LFR to drones would make this a lot harder.

It is possible that other areas in London might have permanent LFR cameras installed similar to in Croydon, likely areas that already see frequent deployments of LFR by the police. This would allow police to more easily deploy LFR to their areas with cameras, but also enable them to more regularly deploy LFR in other parts of London. The MPS currently only has access to a small number of LFR vans. The installation of more permanent cameras frees up these vans allowing for more simultaneous deployments of LFR across the city with officers deployed to multiple locations so speak to those identified. In September 2025, Hammersmith and Fulham council said it was adding LFR to twenty CCTV cameras at ten locations across the borough to “match faces against police databases in real-time”. The council also said that “trained operators in our CCTV control room will verify every match before police take action”.⁴⁵ These uses of LFR by the council are not captured in the data shared by the MPS and further highlight the need for legislation regarding the use of LFR.



The installation of permanent cameras in Croydon means that it is now less obvious to Londoners when operations are happening due to the lack of a large van on the streets, instead

having to infer that a deployment is happening from the larger than normal number of police officers in a single area. As there are no laws in place to govern the use of LFR, the police feel as if they can expand LFR in these ways, escalating surveillance into people's lives. Any potential laws governing LFR might say that a large visual symbol like a van has to be used instead of permanent CCTV cameras in order to give the public a visual signal that deployments are taking place.

In addition, while for now the police have said that the permanent LFR cameras are only on when an operation is taking place, there is still the potential for 24/7 monitoring, with Londoners unable to tell if the cameras are operational or not. This makes the feeling of being under surveillance in London feel routine and begins to be a slippery slope to preventative policing and a blurry line between safety and social control.

The MPS says that this is just a pilot, but it is unclear when this pilot will end. In a recent press release the MPS said that pilot would: “undergo an evaluation in the coming months to assess its effectiveness”.⁴⁶ Croydon councillors have told me that the MPS did not follow through on the promised consultation they said they would hold regarding the installation of the cameras.

LFR was not used at the large scale Unite the Kingdom rally in September 2025, but when answering questions from the London Assembly in November 2025 the Metropolitan Police Commissioner said: “In terms of events policing, we have not yet deployed it on a protest. I do not rule it out, but it is a different prospect. Given the rights of protesters, I would be nervous about the chilling effects, though. We have to be careful about when we do it. However, clearly, if we had a particularly violent protest where we had intelligence that there might be a lot of wanted people turning

up to it, I would not rule out using it. At the moment, that threshold has not been met.” This suggests that use of LFR at protest events is a possibility in the future, which is something I disagree with.

The Metropolitan Police Service have not operationally used LFR within the boundaries of Notting Hill Carnival itself, with the BBC reporting in August 2025 that the MPS said that “LFR cameras will be used on the approach to and from Carnival and not within the event boundaries”.⁴⁷ At the time of the deployment I told The Voice:

“Deploying live facial recognition at Notting Hill Carnival, an event rooted in anti-racist history and Black Caribbean culture, is a shocking and concerning decision from the Met.

“How is it justifiable that people celebrating their heritage, dancing in the streets, wearing traditional clothing, attending with their family and friends, should be scanned and tracked like potential criminals?

“The Met says cameras will be stationed to monitor travel to and from Carnival, but Carnival is a sprawling event, spread across large parts of West London. How does this work in practice? What are the lines that define what is inside the festival and what isn’t?

“This all feels rushed and massively targeted.

“Many Black Londoners I’ve spoken to say they feel over-policed and under protected and the way carnival is treated by the Met year in, year out reflects that.”⁴⁸

It is possible to imagine a future where the MPS decides to deploy LFR within the boundaries of events like Notting Hill Carnival or other mass

participation spaces like within football stadiums, arenas or transport hubs under the premise of public safety.

The London Assembly recently received a letter from the Interim Chief Financial Officer for the MPS telling us that: “the overall revenue budget in 25/26 for OIFR (Operator Initiated Facial Recognition) is £763k”.⁴⁹ But on the MPS website about LFR it says: “The Met keeps its need to use Facial Recognition technologies under review but does not presently use Operator Initiated Facial Recognition”.⁵⁰ So the MPS seem to be spending £763,000 on a form of facial recognition technology they are not using.

This raises concerns for me about the continued lack of transparency from the MPS as well as who is on this data set we haven’t previously heard about. This is also a sign of further uses of facial recognition technology seemingly being explored by the MPS.

The Mayor’s and Deputy Mayor’s position

In a London Assembly Police and Crime Committee meeting on 28 January 2026 the Deputy Mayor for policing and Crime Kaya Comer-Schwartz said that LFR was: “a key part of the work they [MPS] have been doing to reduce the amount of homicides and violence happening”.

In the same meeting she went on to say regarding technology in policing: “there needs to be the correct oversight, checks and balances and listening to community concerns about issues around disproportionality or surveillance is understandably part of how we shape that” and that “it’s right that all tactics that the police use that it is done proportionately, ethically, and it is right that we

have a model of policing by consent listening to the concerns of Londoners.

“Raising concerns is a valid thing, the work MOPAC has done to review LFR has led to an increase in the amount of pixels for example which reduces the amount of disproportionality, that’s our work to look at things, suggest things, push the MPS to improve their services for Londoners. I don’t shy away from that”.⁵¹

In July 2024 Kaya, then an Islington Councillor and also leader of Islington Council, voted for a motion calling for an immediate stop to the use of LFR in Islington as well as to “ask the Executive Member for Community Safety to write to the Mayor of London to ask that the Metropolitan Police, Transport for London and the other agencies he is responsible for to refrain from using LFR technology within Islington”.⁵²

When asked about this vote at her confirmation hearing conducted by the London Assembly Police and Crime Committee in October 2024 Kaya instead said: “we all recognise that those tactics used have to be done ethically and proportionately, and I look forward to working, hopefully, with the Mayor’s Office for Policing and Crime (MOPAC) to ensure that that is the case in using tactics like live facial recognition”.⁵³ She also agreed that the Mayor should not be interfering in the MPS’s operational independence.

In 2023 the Mayor said: “The appropriate use of live facial recognition (LFR) can aid the police by locating wanted offenders, including high-risk individuals, identifying suspected terrorists

and locating vulnerable people, helping to keep our communities safe. It is, however, important that this technology is deployed proportionately, lawfully and ethically and that the MPS is transparent about where, when and how it is used to maintain the trust of Londoners.”⁵⁴

In December 2025 the Mayor also said: “I have always been clear that technology, including Live Facial Recognition (LFR), plays a vital role in supporting the Metropolitan Police Service (MPS) to prevent and tackle crime and keep London’s communities safe. The decision to deploy LFR is an operational one made by the MPS, based on intelligence and policing needs. All police forces in England and Wales are operationally independent, and neither I nor MOPAC make such decisions.

My role is to oversee and scrutinise the MPS’s use of LFR to ensure deployments are legal, ethical and effective, while maintaining public trust. The London Policing Board recently challenged the Commissioner over its use. This also includes senior meetings with the Commissioner and the MPS lead for facial recognition, as well as regular MOPAC attendance at the MPS Facial Recognition Technology Board to offer support and challenge.

This work is informed by the London Policing Ethics Panel (LPEP), which I established to advise on issues which affect public confidence. LPEP’s recent review of LFR assessed the MPS against five ethical conditions and provided recommendations which now guides my ongoing oversight”.⁵⁵

MYTH BUSTING

Myth 1: “If you have nothing to hide, then it is fine”

In February 2024 Shaun Thompson was returning home from a volunteering shift with Street Fathers, a group that helps to protect young people from knife violence when he was wrongly identified as a suspect by Live Facial Recognition (LFR) technology used by the Metropolitan Police Service (MPS) outside London Bridge tube station. He was held for 30 minutes and only let go after showing officers a photo of his passport in order to prove that he wasn't someone else. Shaun is due to have his case heard in the High Court in January 2026.⁵⁶

There is no statutory requirement to carry identification on you, but it seems the need for Londoners to provide proof that they are themselves in order to traverse the city is growing.

Data from the MPS 2025 LFR annual report says that 8 out of the 10 false alerts that occurred in the time period they were looking at (11 September 2024 to 10 September 2025) were false alerts of Black people.⁵⁷ This shows that the burden of having to prove misidentification does not fall evenly across Londoners and that Black Londoners are often over-policed and under-protected by the MPS. The MPS dismiss this finding in their own report by saying: “this is based on a very small sample size. Overall, the system’s performance remains in line with expectations, and any demographic imbalances observed are not statistically significant.”⁵⁸

This over policing also has a chilling effect on people. The MPS recognise that: “communities with lower levels of trust in the police may also be less confident in the use of technologies like LFR” and so repeated uses of this technology can have an impact on the actions that Londoners take and the way they choose to live their lives.⁵⁹

In addition, the Equality and Human Rights Commission (EHRC) made a submission to a judicial review on LFR making similar points. In a press release on the submission the EHRC said LFR: “can be intrusive, especially so when used on a large scale, and warns that its use at protests could have a “chilling effect” on individuals’ rights under Articles 10 and 11. These rights are fundamental to democratic society”.⁶⁰

Having your privacy and civil liberties infringed by the police is an impact, and one that needs to always be considered. Just because the impact of the infringement is not visible like a scar, does not mean that it has no damage on the person. Big Brother Watch has said the recent developments regarding LFR are a “frightening expansion” of the technology and said it was “worrying for our democracy”.⁶¹

Myth 2: “It is cheap and will save police money”

The police, and the MPS in particular, have repeatedly obfuscated exactly how much money is spent on LFR in London. In 2020, my predecessor on the London Assembly Sian Berry asked the Mayor what the total cost of all

deployments of live facial recognition there had been to date at the time (24 February 2020, so only two full operation deployment had taken place) including a breakdown of all costs needed and associated with its use, deployment and operation, such as software, hardware, plain-clothed and uniformed officers and the cost of evaluation. She was told: "No specific budget has been set aside for the deployment of LFR, as such it is not possible to make an assessment of the costs of the trials or deployments to date which have drawn from existing core budgets and local resources. In a Freedom of Information Request from 2023 the MPS said that the estimated software and hardware cost of LFR at that point was £500,000.⁶²

I have since asked additional questions of the Mayor to try and get more information of the cost of elements from the MPS, but not no avail. In July 2024 I was told: "Live Facial Recognition Technology (LFR) is deployed in support of wider policing operations and not as a standalone tactic, therefore, specific costs are not collated."⁶³ I tried asking for how many officers and time it takes to support a single deployment so I could do some of my own working out if the MPS weren't going to tell me directly, they said: "The number of hours required to support a single deployment of LFR vary significantly depending on several factors such as complexity, scale, duration, location, and the resources allocated for the deployment. Because the tactic supports other police activities, the number of hours is not captured"⁶⁴ and that "The Metropolitan Police Service (MPS) has informed me that it is not possible to provide the exact figures requested due to the dynamic nature of operational Live Facial Recognition (LFR) deployments".⁶⁵ Despite these refusals to provide meaningful data that could be used to determine the cost effectiveness or not of the MPS use of LFR they continue to claim in public facing materials that LFR is a success such as in the October 2025

report, Live Facial Recognition Annual Report, from the MPS which says: "LFR helps the MPS locate these people without resorting to more intrusive, expensive and time-consuming tactics" and "We know that LFR boosts productivity. By making officers more effective during hotspot operations, LFR allows us to achieve more arrests and deliver a greater impact on public safety than would be possible with the same resources alone."⁶⁶

Until the MPS disclose how much police time and resources deployment of LFR take up there is simply no way to assess whether or not LFR could save police money or is a good use of police resources.



Myth 3: "It is just like CCTV"

LFR is materially different from technology like CCTV. Though it has a camera like CCTV does it is closer in effect on us as people and our civil liberties to finger printing technology than CCTV. CCTV has its own issues, which I won't be going in to here.^{67,68,69} But a critical difference between CCTV and LFR is the checking process. When you are captured on CCTV you and your actions are not compared to a database of people. But when you have your fingerprints taken, they are normally either compared to a database of other taken fingerprints. Walking

down a high street and having your face scanned by LFR is more like having to give over your fingerprints in order to go shopping than it is to the shopping centre having CCTV.

Another key difference is the fact that CCTV is a passive form of technology while LFR is active. While CCTV might be recording constantly there is not always someone looking at the camera feed and assessing you and your actions. But LFR is constantly judging and assessing you and others around you, suspecting you of criminality of some kind, functionally putting you in a police lineup.

Myth 4: “It will make us safer, so we have to do it”

There are lots of things that if we did would make people safer. But every decision comes with trade-offs and costs. For instance, if we really wanted to remove the possibility of crime from ever occurring, we would simply put everyone in prison, that way no crime can happen. But we don't do this because the costs, both on finances but also on people's liberties are too high. So it is never entirely true to say that “we are doing everything we can to keep people safe”. There are always additional levers that could be used that aren't being used. And in my view, it is right that we don't use all the levers available to us because the cost on civil liberties becomes too great.

In my view LFR crosses this threshold in to being a higher cost on civil liberties to bear than is worth it. Others may draw their own lines with regards to civil liberties elsewhere, but we all have our own lines. I hope through this report I have shown why I believe the line should be drawn at not using LFR.

Myth 5: “It will help to find missing people, and the most dangerous criminals and terrorists”

In 2026, MPS officers have told me that there are no missing people currently included on the MPS LFR watchlists and so LFR is not used to find missing people. In addition, the use case of “Missing Person Hotspot” has never been used as a reason for the deployment of LFR by the MPS. So, at this moment in time, LFR is not used to find missing people.

The MPS LFR Annual report details the number of arrests made using LFR broken down into offence type.⁷⁰ The most common offence the MPS arrested someone for using LFR was a variation of theft (theft, burglary, handling stolen goods etc). The next most common offence type was some kind of order breach (breach of Sexual Harm Prevention Order, breach of notification requirement, bail offences etc). The annual report does not list any arrests for terrorism offences. So, at this moment in time, LFR is not used to find terrorists.

In a recent press release the lead example the MPS give for how they have used LFR is using it to arrest a 36-year-old woman who was wanted for failing to appear at court for an assault in 2004 when they were probably 15 years old.⁷¹ The public might feel differently about LFR if they knew it was being used on cases such as these.

WHAT CAN YOU DO ABOUT LIVE FACIAL RECOGNITION

On 4 December 2025 the UK Government launched a consultation into a new legal framework for law enforcement use of biometrics, facial recognition and similar technologies.⁷² This consultation is open until 12 February 2026.

I encourage you to respond to this consultation and let them know your views on the need for legislation government the use of live facial recognition technology.

How to respond to the consultation

In the appendix of this report is how I am going to respond to the consultation with my responses highlighted in yellow. Feel free to base your own responses on mine, but often consultation responses are better when you personalise them and speak in your own words rather than copy and pasting responses from others.

Big Brother Watch has also shared a suggested form of words on their live facial recognition campaign page which you can use to help construct your own response.⁷³

You can either can email your response to fr-consultation@homeoffice.gov.uk or you can respond online to the survey.⁷⁴

When responding make sure you say:

- The Home Office should ban LFR deployment and installation of permanent facial recognition cameras.
- LFR is an attack on individual and societal civil liberties and privacy.
- LFR subjects the public to mass identity checks, without a basis for suspicion, going against 'innocent until proven guilty' as everyone is treated as a suspect by default.
- Constitutes over-policing
- If the Home Office, does rollout the tech, sufficient safeguards must be in place, e.g. a warrant needed, and it only being used for serious crimes.

Appendix: My response to the consultation

1. To what extent do you agree or disagree that a new legal framework should apply to all use of ‘biometric technologies’ by law enforcement organisations?

- Agree
- Neither agree nor disagree
- Disagree
- Don’t know

Please explain your answer:

There needs to be laws governing how LFR is used. For too long the police have decided for themselves how to use LFR, with no restrictions or oversight on how they use it meaning they end up marking their own homework. This is not acceptable and is a threat to civil liberties. Any legal framework should mirror the EU AI Act and ensure that other uses by other public authorities and the private sector are also banned.

2. Do you think a new legal framework should apply to ‘inferential’ technology i.e. technology that analyses the body and its movements to infer information about the person, such as their emotions or actions?

- Yes, the legal framework should apply to technology which can make inferences about a person’s emotion and actions.
- No, the legal framework should not apply to technology which can make inferences about a person’s emotion and actions.
- Don’t know

Please explain your answer:

LFR deployments subject the public to mass identity checks without any basis for suspicion and the same issues extend to ‘inferential’ technology and so should also be covered by the new legal framework, and should cover other potential developments too.

3. Do you think a new legal framework should apply to technology that can identify a person’s clothing or personal belongings, or things that they use (e.g. a vehicle)?

- Yes, the legal framework should apply to technology that can identify objects linked to an individual.
- No, the legal framework should not apply to technology that can identify objects linked to an individual.
- Don’t know

Please explain your answer:

Technology that can identify a person by their belongings is still identifying the person and subjecting us all to a form of identity checks and so should be covered under the same legal framework.

4. Do you think that the types of technology the legal framework applies to should be flexible to allow for other technology types to be included in future? The alternative would be for Parliament to consider each new technology.

- Yes, the types of technology the legal framework applies to should be flexible
- No, the types of technology the legal framework applies to should not be flexible
- Don't know

Please explain your answer:

Companies are constantly innovating, and the police will always try to push the boundaries and so any legislation should be able to adapt to the growing and changing technology that develops.

5. Do you think a new legal framework should only apply to law enforcement organisations' use of facial recognition and similar technologies for a law enforcement purpose?

- Agree
- Neither agree nor disagree
- Disagree
- Don't know

Please explain your answer:

While law enforcement organisations should have the strictest laws governing them given the significant powers they possess, the legal framework should also extend to all parts of life. The infringement of rights caused as a result of using facial recognition technologies occurs regardless of whether they are used by law enforcement or not and so should also be included in any potential legal framework.

6. When deciding on the new framework, the government will use the factors listed above to assess how law enforcement organisations' use of biometric technologies, such as facial recognition, interferes with the public's right to privacy. What other factors do you think are relevant to consider when assessing interference with privacy?

First and foremost, LFR should not be used. The government is not considering enough the harm caused by use of LFR. The use of LFR subjects all of us to suspicion and spying and flips the presumption of innocence. It requires us all to prove we are not criminals which has never been the case in the UK. The onus instead should be on the police and others to prove that someone is a criminal before subjecting them to such tactics. For use by law enforcement groups, the degree to which the local population is overpoliced should also be considered. Deployments by the MPS have consistently been more likely to take place in areas with a larger percentage of people who are from Black, Asian and minority ethnic backgrounds.

7. When designing the new framework, the government will also assess how police use of facial recognition and similar technologies interferes with other rights of the public. This includes things

such as the right to freedom of expression and freedom of assembly. In addition to the factors listed above Question 6, which factors do you think are relevant to consider when assessing interference with other rights?

The use of LFR at places such as protest and public events will have a chilling effect on those considering attending. People are likely to not want to attend these due to the presence of LFR cameras, they don't want to have their attendance tracked. They don't want to feel like in order to exercise their rights they have to have their face checked against a wanted list. That should not be a requirement in order to participate in society and in order to use their rights to freedom of expression and freedom of assembly. It is also important to factor in the right to privacy and a private life that also needs to be protected in any potential deployment. Indeed, all of the rights needs need to be considered when the possibility of live facial recognition deployments are considered. As with MPS deployments outside of Notting Hill carnival, LFR physically taking place outside of the event or protest itself is not enough, as the implications of the LFR deployment taking place are the same whether they happen near an event or at an event.

The expanding use of LFR by shops and other retail establishments poses real issues. Here have been stories of people wrongly identified by the technology and banned from supermarket. Denying people access to purchase food is a serious infringement on their rights. If various supermarkets use the same system of LFR or are in an information sharing arrangement with other supermarkets, it's possible that a person might be inadvertently banned from purchasing food from all shops near them. This is wrong and cannot be allowed to occur not just on human rights grounds but also on consumer rights grounds. Even for correctly identified wrongdoing, the punishment for such wrongdoing cannot be to never be able to step foot in a supermarket ever again, that is a wildly disproportionate outcome. The government needs to have oversight over this to ensure that people can still go about their lives in a reasonable way.

8. Do you agree or disagree that 'seriousness' of harm should be a factor to decide how and when law enforcement organisations can acquire, retain, and use biometrics, facial recognition, and similar technology?

- Agree
- Neither agree nor disagree
- Disagree
- Don't know

Please explain your answer:

Yes, seriousness needs to be a factor. If the UK insists on using LFR then it should only be for the most serious cases. The UK needs to take a lead from the EU who are only allowed to use it for very specifically defined cases. Currently police forces such as the MPS are using it routinely just because they can. The result is that they are also picking up low level offenders, not the missing people or not always the extremely dangerous offenders that many people might associate with such a technology. As such this technology should not be allowed to be used in situations such as shops where it is merely there to prevent low level offences such as shoplifting. By restricting the use of this power to only very serious or live situations, a massive contrast to the current use by police forces, the rights of citizens to go about their lives won't be infringed upon nearly as much as they are in the currently situation where the use of LFR by certain police forces is not considered with the

degree of seriousness and gravity that should befit such a significant technology and future technologies.

9. What factors do you think are relevant to assessing ‘seriousness’ of harm? For example: the type of offence that has been committed; the number of offences that have been committed; the characteristics of the victim; whether there is an imminent threat to life, or there is an urgent safeguarding issue.

The UK should take notice of the EU law governing LFR and how it can only be used in very serious situations for specific crimes. If the government insist on using LFR then it should only be used for very serious crimes and ongoing situations. It should not be used, as it currently is, on a regular basis for low level offending.

10. The government believes that some uses of facial recognition and similar technologies require more senior authorisation and that this should be set out in the new legal framework. Do you agree? This could be different levels of authorisation within law enforcement organisations, or, in some circumstances, authorisation by a body independent of law enforcement organisations.

- Agree
- **Neither agree nor disagree**
- Disagree
- Don’t know

Please explain your answer:

As established in prior answers, LFR should not be used at all by the police. But if it does have to be used then it should only be used in the most serious of circumstances. As such all uses of LFR should only be in the most serious circumstances and therefore require the approval of a senior officer in order for them to take place. The use of LFR should not be routine or regular, it should only be for exceptional circumstances and therefore approval from a senior officer is an appropriate step before deployment.

11. Are there circumstances where law enforcement organisations should seek permission from an independent oversight body to be able to acquire, retain, or use biometrics (e.g. use facial recognition technology)? This could include exceptional circumstances outside of the usual rules.

LFR should not be used and so there are no situations in which there should be a need to seek further permissions. If LFR is used it should be for extremely limited circumstances.

12. If law enforcement organisations were not able to identify a person using law enforcement records and specific conditions were met, the systems could be enabled in such a way as to enable them to biometrically search other government databases, such as the passport and immigration databases.

In what circumstances should biometrics searches of other government databases be permitted?

Circumstances

**Yes No Don't
know**

Searches should be for ‘serious’ offences.

Yes

Searches should be for a safeguarding purpose (e.g. a suspected missing or vulnerable person).

Yes

Searches should be to identify injured, unwell or deceased people.

No

13. If biometric searches of other government databases take place, what safeguards should be in place?

Safeguards

**Yes No Don't
know**

Search requests should be approved by a senior police officer or other appropriately qualified person.

Yes

Search requests should be approved by an independent body.

Yes

Search records should be kept for review by a senior police officer or other appropriately qualified person

Yes

Records should be kept for review by an independent body.

Yes

Are there any other limitations or safeguards you think should be considered?

Yes

14. The functions set out above could be undertaken by one single independent oversight body – do you agree? This could be achieved by them overseeing multiple codes of practice (see also questions 15 and 16).

- Agree
- Neither agree nor disagree
- Disagree
- Don't know

Please explain your answer:

Oversight for this power should not be with the police. The police are too keen to use this technology and would not hold themselves appropriately accountable for its use. For simplicity for the public a single oversight body should have oversight of the technology rather than fragments between multiple. It does not necessarily need to be a new body, but it should be clear to the police and to the public who it is. Mayors and policing panels also have a role to play in oversight of the technology and police forces should be more transparent with elected representatives about how they use the technology

15. What sort of powers or obligations should the oversight body have to oversee law enforcement use of facial recognition and similar technologies?

Yes No Don't know

Publish codes of practice detailing what law enforcement organisations would be expected to do to meet their legal and ethical obligations when developing or using technology.

Yes

Investigate instances where use of a technology presents substantial risks to criminal investigations or proceedings due to non-compliance with the code of practice.

Yes

Investigate instances where use of a technology has potentially unjustified interferences with the rights and protections people have under data protection, equalities and human rights law.

Yes

Investigate instances where a technology has been misused, hacked or accessed without authorisation.

Yes

Request information from law enforcement organisations to aid oversight of police use of the technology.

Yes

Issue compliance notices requiring law enforcement organisations to take specific actions to remedy non-compliance.

Yes

Seek injunctions to prevent or stop technology use that pose significant risks, in conjunction with other statutory bodies where necessary.

Yes

Make public declarations about non-compliance to inform stakeholders and the public.

Yes

Yes	No	Don't know
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Receive complaints and referrals from anyone, in order to inform their investigations. Yes

Publish an annual report detailing compliance with the relevant Code(s) of practice and recommendations to Parliament on revisions to the Code. Yes

Set standards that help assure the scientific validity of the technology Yes

Decide which new technologies or new uses of existing technologies should be added to the legal framework in future. Yes

What other powers or obligations do you think there should be?

Power to prevent police forces from using the technology because LFR should not be used.
 Obligation to ensure that the technology is being used proportionately by factors such as ethnicity.
 Powers to prevent the spread of LFR technology into more elements of our daily lives.

16. The government believes the new oversight body should help set specific rules for law enforcement organisations to follow, to guard against bias and discrimination when using technologies such as facial recognition, and check compliance with these rules.

To what extent do you agree or disagree?

- Agree
- Neither agree nor disagree
- Disagree
- Don't know

17. What types of rules might the new oversight body be responsible for setting? These could include ensuring tools are of sufficient quality or determining what testing should be undertaken.

The oversight body should ensure that LFR is not used at all. If LFR has to be used it should ensure that it is not used disproportionately and that the rights of people are protected while the technology is used. Repeated deployments to the same locations of LFR technology should also be scrutinized to ensure that communities do not suffer from being over policed by LFR technology.

WHAT DO YOU THINK?

Please get in touch with me if you have any comments or suggestions.

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This report sets out my views as an individual Assembly Member and not the agreed view of the entire Assembly.

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